## MATHIS, RIGGS & PRATHER, P.S.C.

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February 6, 2009

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FEB 9 2009

Beth O'Donnell, Executive Director Kentucky Public Service Commission 211 Sower Blvd P.O. Box 615 Frankfort, KY 40602

PUBLIC SERVICE COMMISSION

Re: Proposed Adjustment of the Wholesale Water Service Rates of the Frankfort Electric and Water Plant Board Case No. 2008-00250

Dear Ms. O'Donnell:

Enclosed are the original and ten copies of the Second Request for Production of Documents filed on behalf of Peaks Mill, Elkhorn, North Shelby and U.S. 60 Water Districts. Please file them to the record of this action and return the eleventh file-stamped copy to me in the enclosed self-addressed, stamped envelope.

Thank you very much for your attention to this matter.

Yours Truly,

MATHIS, RIGGS & PRATHER, P.S.C.

Donald T. Prather

DTP/pm Enclosure Dtp/wtr/us60/rate/psc ltr2

## COMMONWEALTH OF KENTUCKY

RECEIVED

FEB 9 2009

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED	ADJU	STMENT	OF	${\rm THE}$	WHOLESALE	)			
WATER SE	RVICE	RATES	OF	THE	FRANKFORT	)	CASE	NO.	2008-00250
ELECTRIC	AND	WATER	PLAN	IT B	OARD	)			

## ON BEHALF OF PEAKS MILL WATER DISTRICT, ELKHORN WATER DISTRICT, NORTH SHELBY WATER COMPANY AND U.S. 60 WATER DISTRICT OF SHELBY AND FRANKLIN COUNTIES, KENTUCKY

Comes Peaks Mill Water District ("Peaks Mill"), Elkhorn Water District ("Elkhorn"), North Shelby Water Company ("North Shelby") and U.S. 60 Water District of Shelby and Franklin Counties, Kentucky ("U.S. 60"), by counsel, and hereby tenders the following Request for Production of Documents to Frankfort Electric and Water Plant Board ("Frankfort"):

Request No. 1: Please produce a copy of Schedules D and E (of the Ganett Fleming Cost of Service Study attached as Item 21, Exhibit 1, in Volume 4 of 5 of Frankfort's Response to the Commission's Order of July 2, 2008) that includes a column showing a cost of service for each line item as well as a computation showing the proposed rates as a percent of the cost of service.

Respectfully submitted,

MATHIS, RIGGS & PRATHER, P.S.C.

1: Sharly

Donald T. Prather

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Attorney for North Shelby Water Company and U.S. 60 Water District of Shelby and Franklin Counties, Kentucky

Thomas A Marsall as DDD w/p

Thomas A. Marshall, Esq.

P.O. Box 223

212 Washington Street

Frankfort, KY 40602

Phone: (502) 223-4723

Fax: (502) 223-0001

Attorney for Peaks Mill Water District and Elkhorn Water District

## CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing was this day of February, 2009 served via first class mail, postage prepaid on the following:

Hance Price, Esq.
P.O. Box 308
317 W. Second Street
Frankfort, KY 40602
Attorney for Frankfort Electric and Water Plant Board

John N. Hughes, Esq. 124 West Todd Street Frankfort, KY 40601

Attorney for Frankfort, Frankfort Electric and Water Plant Board

Donald T. Prather

Dtp/wtr/us60/rate increase/interrogatories 2